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June 2, 2025

VIA ECF

Honorable Michael E. Farbiarz
United States District Judge
District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Square
Newark, New Jersey 07102

Re: *United States v. Haghighat, et al.*, Crim. No. 25-339

Dear Judge Farbiarz:

This firm represents defendant Seyedfarbod Sabzevari in the above-referenced criminal matter. We write to respectfully request that Mr. Sabzevari be permitted to appear before Your Honor via telephone or other remote means for his arraignment, now scheduled before Your Honor on June 16, 2025 at 11:00 am. The undersigned counsel for Mr. Sabzevari will attend the arraignment in-person and will be prepared to address scheduling, and any other matters that may arise. The Government has graciously consented to this request.

I am, of course, aware that defendants are normally required to attend arraignment in person (though that requirement has been relaxed at times over the past few years – for example, during COVID). Here, I would ask that Mr. Sabzevari not be required to appear in person because of the significant financial hardship that his travel would entail. Mr. Sabzevari is a resident of California, and is currently unemployed (and as a result of his indictment, effectively unemployable), and travel to New Jersey would entail expensive air travel. This is not to say that Mr. Sabzevari poses any risk of not appearing for court appearances should that be necessary—indeed, having received a summons to do so, he traveled here this past Wednesday, May 28, 2025 for what we were initially told would be an initial appearance and arraignment, at which point he was released on an unsecured appearance bond. The cost to him of doing so, including travel and hotel, was over \$1,000.00, and it is not a cost that he can easily bear a second time in such a short period. To make matters worse, Mr. Sabzevari does not currently have the necessary identification required for air travel, such as a passport or Real ID. Therefore, in order to travel to New Jersey, Mr. Sabzevari is required to undergo an extensive verification process with TSA (as he did last week), which makes the travel even more uncertain, difficult and time-consuming. Mr. Sabzevari is attempting to obtain identification but without a passport, it is difficult.

In any event, Mr. Sabzevari will certainly appear remotely, and as noted above, we as his counsel will be present in person. We are hoping that that will be satisfactory to the Court, as it is to the Government. If it is, we have, for the convenience of the Court, provided a space below for Your Honor to “So Order” the relief requested, should you decide to do so.

GIBBONS P.C.

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As always, we thank Your Honor for your kind consideration of this request, and look forward to seeing you on June 16.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All Counsel of Record (via ECF)

So Order: _____
Hon. Michael E. Farbiarz, U.S.D.J.